

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JITENDRA VEKARIA,

Plaintiff,

-against-

MTHREE CORPORATE CONSULTING, LTD.,  
JOHN WILEY & SONS, INC., ECI PARTNERS  
LLP, ALEX HEADLEY, BENJAMIN TOWN,  
THOMAS SEYMOUR, and RICHARD  
CHAPMAN,

Defendants.

Case No. 1:22-cv-03197-JPC

**AFFIDAVIT OF THOMAS  
SEYMOUR IN SUPPORT OF  
HIS MOTION TO DISMISS  
PLAINTIFF'S FIRST  
AMENDED COMPLAINT**

STATE OF MASSACHUSETTS                     )  
  ) ss.:  
COUNTY OF SUFFOLK                         )

Thomas Seymour, being duly sworn, deposes and says:

1. I was the Senior Director of Human Resources at Mthree Corporate Consulting Ltd., (“Mthree UK”) whose registered office is at 3 Harbour Exchange Square, South Quay, London, E14 9GE, from January 4, 2016 until November 24, 2022.

2. During my time as an Mthree UK employee, I worked exclusively at Mthree UK's offices in London, England.

3. I was never employed by the Delaware corporation Mthree Corporate Consulting, Ltd. (“Mthree US”). Mthree US was and is a subsidiary of Mthree UK.

4. I am not and have never been a shareholder in Mthree UK or any of its subsidiaries, nor have I ever held any sort of ownership interest in Mthree UK or any of its subsidiaries. I never received any compensation from Mthree US.

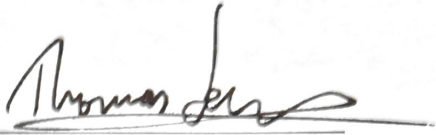
5. I never held an ownership interest in Mthree US or any other business that derived revenue from interstate or international commerce during the time I was employed by Mthree UK.

6. Since I was not a shareholder in Mthree UK or any of its subsidiaries, I was not a party to the transaction wherein John Wiley & Sons Limited (a subsidiary of John Wiley & Sons, Inc.) purchased Mthree UK and its subsidiaries.


7. Although I was the Senior Director of Human Resources, I did not negotiate the terms of Mr. Vekaria's employment agreement. I did not make any representations to Mr. Vekaria, on my own behalf or on behalf of Mthree UK or Mthree US. Instead, I acted as a conduit between Mr. Vekaria and Mthree UK's CEO Alex Headley. I drafted the offer letter strictly in accordance with Mr. Headley's instructions and sent the offer email to Mr. Vekaria. I then relayed any feedback or concerns between Mr. Vekaria and Mr. Headley. I performed these responsibilities from London, England.

8. At the time Mr. Vekaria received his employment offer and negotiated the terms of his employment agreement with Mr. Headley, I was not physically present in New York. Although I later visited New York as part of my responsibilities as Senior Director of Human Resources, the purpose of my visit was not to meet with Mr. Vekaria about the Employment Agreement.

9. I only signed Mr. Vekaria's employment agreement with Mthree US as part of my responsibilities as Mthree's Senior Director of Human Resources. I did not sign it on behalf of myself, as I was not a party to that agreement.

  
Thomas Seymour

Sworn to before me  
this 1<sup>st</sup> day of February, 2023

  
Notary Public

